

United States District Court
Southern District of New York

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Jorge Vega Marin,

Plaintiff,

Index No.: 07 CV 6191

Lynch, J

-against-

Sixth Ave. Shoe Repair d/b/a Andrade
General Shoe Repair, Cesar Andrade and
Theresa Andrade

Defendants.

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Defendants, by their attorney, Kenneth Geller, P.C. as and for their answer to plaintiff's complaint, alleges upon information and belief as follows:

1. Deny the allegations in paragraph 1 of plaintiff's complaint.
2. Deny knowledge or information sufficient to form a belief as to the allegations in paragraph 2 of plaintiff's complaint.
3. Deny the allegations in paragraph 3 of plaintiff's complaint.
4. Deny the allegations in paragraph 4 of plaintiff's complaint.
5. Deny the allegations in paragraph 5 of plaintiff's complaint.
6. Deny the allegations in paragraph 6 of plaintiff's complaint.
7. Deny the allegations in paragraph 7 of plaintiff's complaint.
8. Deny the allegations in paragraph 8 of plaintiff's complaint.
9. Deny the allegations in paragraph 9 of plaintiff's complaint.
10. Deny the allegations in paragraph 10 of plaintiff's complaint.
11. Deny the allegations in paragraph 11 of plaintiff's complaint.
12. Deny the allegations in paragraph 12 of plaintiff's complaint.
13. Deny the allegations in paragraph 13 of plaintiff's complaint.
14. Deny the allegations in paragraph 14 of plaintiff's complaint.
15. Deny the allegations in paragraph 15 of plaintiff's complaint.
16. Deny the allegations in paragraph 16 of plaintiff's complaint.
17. Deny the allegations in paragraph 16 of plaintiff's complaint.
18. Deny the allegations in paragraph 18 of plaintiff's complaint.

19. Deny the allegations in paragraph 19 of plaintiff's complaint.
20. Deny the allegations in paragraph 20 of plaintiff's complaint.
21. Deny the allegations in paragraph 21 of plaintiff's complaint.
22. Deny the allegations in paragraph 22 of plaintiff's complaint.
23. Deny the allegations in paragraph 23 of plaintiff's complaint.
24. Deny the allegations in paragraph 24 of plaintiff's complaint.
25. Deny the allegations in paragraph 25 of plaintiff's complaint.
26. Deny the allegations in paragraph 26 of plaintiff's complaint.
27. Deny the allegations in paragraph 27 of plaintiff's complaint.
28. Deny the allegations in paragraph 28 of plaintiff's complaint.
29. Deny the allegations in paragraph 29 of plaintiff's complaint.
30. Deny the allegations in paragraph 30 of plaintiff's complaint.
31. Deny the allegations in paragraph 31 of plaintiff's complaint.
32. Deny the allegations in paragraph 32 of plaintiff's complaint.
33. Deny the allegations in paragraph 33 of plaintiff's complaint.
34. Deny the allegations in paragraph 34 of plaintiff's complaint.
35. Deny the allegations in paragraph 35 of plaintiff's complaint.
36. Deny the allegations in paragraph 36 of plaintiff's complaint.
37. Deny the allegations in paragraph 37 of plaintiff's complaint.
38. Deny the allegations in paragraph 38 of plaintiff's complaint.
39. Deny the allegations in paragraph 39 of plaintiff's complaint.
40. Deny the allegations in paragraph 40 of plaintiff's complaint.
41. Deny the allegations in paragraph 41 of plaintiff's complaint.
42. Deny the allegations in paragraph 42 of plaintiff's complaint.
43. Deny the allegations in paragraph 43 of plaintiff's complaint.
44. Deny the allegations in paragraph 44 of plaintiff's complaint.
45. Deny the allegations in paragraph 46 of plaintiff's complaint.
46. Deny the allegations in paragraph 47 of plaintiff's complaint.
48. Admit the allegations in paragraph 48.
49. Admit the allegations in paragraph 49.

50. Defendants repeat, reaffirm and re-allege each and every admission, denial and denial based on lack of knowledge or information sufficient to form a belief in paragraphs 1 through and including 49 of their answer as if set forth at length herein.

51. Deny the allegations in paragraph 51 of plaintiff's complaint.

52. Deny the allegations in paragraph 52 of plaintiff's complaint.

53. Deny the allegations in paragraph 53 of plaintiff's complaint.

54. Defendants repeat, reaffirm and re-allege each and every admission, denial and denial based on lack of knowledge or information sufficient to form a belief in paragraphs 1 through and including 49 and paragraphs 51 through 54 of their answer as if set forth at length herein.

55. Deny the allegations in paragraph 55 of plaintiff's complaint.

56. Deny the allegations in paragraph 56 of plaintiff's complaint.

57. Deny the allegations in paragraph 57 of plaintiff's complaint.

58. Defendants repeat, reaffirm and re-allege each and every admission, denial and denial based on lack of knowledge or information sufficient to form a belief in paragraphs 1 through and including 49, paragraphs 51 through 54 and paragraphs 55 through 57 of their answer as if set forth at length herein.

59. Deny the allegations in paragraph 59 of plaintiff's complaint.

60. Deny the allegations in paragraph 60 of plaintiff's complaint.

61. Deny the allegations in paragraph 61 of plaintiff's complaint.

62. Defendants repeat, reaffirm and re-allege each and every admission, denial and denial based on lack of knowledge or information sufficient to form a belief in paragraphs 1 through and including 49, paragraphs 51 through 54, paragraphs 55 through 57 and paragraphs 59 through 61 of their answer as if set forth at length herein.

63. Deny the allegations in paragraph 63 of plaintiff's complaint.

64. Deny the allegations in paragraph 64 of plaintiff's complaint.

65. Deny the allegations in paragraph 65 of plaintiff's complaint.

WHEREFORE, defendants demand judgment dismissing plaintiff's complaint and for any other and further relief the Court finds just.

Dated: August 10 2007
Inwood, NY

Yours etc.
Kenneth Geller, P.C.

By _____
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